

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT

IN RE:

RODENNA MEDIANTE BARTOLO

BANKRUPTCY NO.: 19-57975-MLO

CHAPTER 7

HONORABLE MARIA L. OXHOLM

DEBTOR

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RESPONSE TO MOTION FOR AUTHORITY TO REDEEM PERSONAL PROPERTY

Santander Consumer USA Inc. ("Creditor"), in response to Debtor's Motion for Authority to Redeem 2012 Cadillac CTS, states as follows:

1. As to Paragraph 1, the Creditor neither admits nor denies and leaves the Debtor to her proofs.
2. As to Paragraph 2, the Creditor neither admits nor denies and leaves the Debtor to her proofs.
3. As to Paragraph 3, the Creditor denies that the fair market value of the vehicle is \$7,142.00. Based on the NADA Official Used Car Guide, Creditor asserts that the value of the vehicle is approximately \$11,100.00.

4. As to Paragraph 4, the Creditor neither admits nor denies and leaves the Debtor to her proofs.

In conclusion, the Creditor prays that the Court deny Debtor's Motion for Redemption.

O'REILLY RANCILIO P.C.

/s/ Craig S. Schoenherr, Sr.

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